

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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Via Electronic Filing

The Hon. Lewis J. Liman U.S.D. J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

The motion to adjourn at Dkt. No. 91 is denied. The Court will address the pending motion to withdraw at the conference on July 24, 2025. Client representatives for DRA Logistics Corp. and 130 St Equities LLC are directed to attend the conference. DRA Logistics Corp. and 130 St Equities LLC are put on notice that a corporation cannot appear in Court pro se and that, if the motion to withdraw is granted, DRA Logistics Corp. and 130 St Equities LLC will need to retain counsel or else be at risk of default. Levin-Epstein & Associates, P.C. are directed to provide a copy of this order to DRA Logistics Corp. and 130 St Equities LLC.

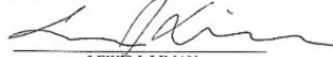
Re:

Cranmore v. Parts Authority, LLC et al

Case No.: 1:24-cv-05842-LJL

July 22, 2025

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Dear Honorable Judge Liman:

This law firm represents Defendants DRA Logistics Corp. and 130 St Equities LLC (collectively, the “DRA Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, the following letter respectfully serves to request an adjournment of the July 24, 2025 in-person conference, to a date and time set by the Court following the entry of an order on the undersigned counsel’s motion to withdraw. [Dckt. Nos. 88, 89].

The basis of this request is that the undersigned law firm has recently filed a motion to withdraw as counsel on behalf of the DRA Defendants. [See Dckt. Nos. 88, 89]. As set forth more fully in the motion to withdraw, following the unexpected death of DRA Defendants’ principal, Amrit Dabie (“Mr. Dabie”)¹, the undersigned law firm diligently attempted to re-establish a client representative, with authority to make decisions on behalf of the DRA Defendants.

The undersigned law diligently attempted to meet-and-confer with Mr. Dabie’s estate over the transmittal of over seventeen (17) emails and phone calls, and the scheduling of a virtual conference. Mr. Dabie’s estate did not respond to the undersigned law firm’s meet-and-confer attempts, including, *inter alia*, to emails transmitted on (i) June 16, 2025; (ii) June 18, 2025; (iii) June 20, 2025; (iv) June 23, 2025; (v) June 25, 2025; (vi) June 27, 2025; (vii) June 30, 2025; (ix) July 1, 2025; (x) July 15, 2025; (xi) July 16, 2025; (xii) July 17, 2025; (xiii) July 18, 2025; and (xiv) July 21, 2025.

The undersigned law firm repeatedly warned Mr. Dabie’s estate, in writing, that absent a timely and productive response to prior outreach, the firm would move to withdraw from the action as counsel.

In light of the foregoing, it is respectfully requested that the Court grant an adjournment of the July 24, 2025 in-person conference, to a date and time set by the Court following the entry of an order on the undersigned counsel’s motion to withdraw. [Dckt. Nos. 88, 89].

¹ Mr. Dabie was an individual defendant in the above-referenced matter, as well as the principal of the eponymously named corporate defendant AD Delivery & Warehousing Inc., as well as corporate defendant AC Automotive, Inc.

Thank you, in advance, for your time and attention.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel